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January 8, 2016

Via ECF Filing

The Honorable Charles R. Breyer
United States District Court
Northern District of California

Michael A. Bowse
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File No. 1000-001

Re: *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, Case No. 3:15-md-02672-CRB, MDL No. 2672

Dear Judge Breyer:

Pursuant to this Court's Pretrial Order No. 2, Eric George and Browne George Ross LLP hereby respectfully submits this letter in application for appointment to the Plaintiff's Steering Committee for vehicle owners.

Browne George Ross is a national law firm with offices in Los Angeles, San Francisco and New York. Its attorneys, who include some of the most respected lawyers in the State of California, have extensive experience and expertise litigating and managing complex class actions and other civil complex litigation. Browne George Ross is also a highly accomplished group of trial lawyers, having obtained 2 of the 100 largest verdicts in California in 2014 (*Orhtotec LLC v. Surgiview S.A.S.*, L.A. Super. Ct. BC390346 (\$47,900,000 jury verdict) and *Neurovision Medical Products, Inc. v. NuVasive, Inc.*, C.D. Cal. 2:09-cv-069880-DSF (\$30,000,000)). We respectfully suggest that Browne George Ross is an ideal choice for the responsibilities that member on the Plaintiff's Steering Committee will entail.

1. Examples of Class Action and MDL Experience

Browne George Ross has significant experience managing and prosecuting extremely complex class actions such as the one now before your honor. Significant examples include a series of several dozen consumer class actions brought before federal district courts and superior courts throughout California alleging the fraudulent sale of Option Adjustable Rate Mortgages. Those actions resulted in several multi-million settlements, including in *In re Wachovia Corp.*

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“Pick a Payment” Mortgage Practices, No.09-md-02015-JF (N.D. Cal.) and *Monaco v. Bear Stearns Residential*, 09-cv-05438-SJO (C.D. Cal.). Browne George Ross LLP is also counsel for plaintiffs and a proposed class of pharmacies in a long-running action alleging violations of certain California survey and reporting laws by pharmacy benefit managers. *Beeman v. Anthem Prescription Management*, 04-cv-407-VAP (C.D. Cal.). The firm also successfully represented plaintiffs and the class in *Marolda v. Symmantec*, 08-cv-05701-EMC (N. D. Cal.), an action alleging fraudulent and misleading sales practices and breaches of implied contracts in connection with the renewals of consumer subscriptions to computer anti-virus products.

2. Judges Before Whom Browne George Ross Appeared

Wachovia: Hon. Jeremy Fogel – (202) 502-4196

Monaco: Hon. S. James Otero – (213) 894-1796

Beeman: Hon. Virginia A. Philips – (951) 328-4461

Marolda: Hon. Edward M. Chen – (415) 522-2034

3. Willingness and Ability to Prosecute the Action

It has always been the goal of Browne George Ross to obtain for its clients the best results possible as expeditiously and efficiently as possible. But, having represented plaintiffs and the classes in many extremely complex actions, the firm is accustomed to devoting substantial attorney and staff time in such actions and is prepared to do so here beginning immediately.

4. Willingness and Ability to Work Cooperatively

As counsel in numerous previous large, complex consumer class actions, Browne George Ross is accustomed to working closely with numerous lawyers from all over the country representing both plaintiffs and defendants. The firm has, I believe, a well-deserved reputation for teamwork and is always ready, willing and able to pursue actions like the one before this Court cooperatively and collegially.

5. Access to Resources Necessary to Pursue the Case

Browne George Ross has the attorneys, staff and financial resources that will be needed to successfully pursue this action. The firm has more than 20 highly experienced trial lawyers (and expanding) and has all of the support staff that are needed to allow its lawyers to work at peak efficiency. It is our intention to devote all of the staffing and funding that will be needed to

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obtain the best possible results for plaintiffs and the proposed classes in the action before the Court.

6. Willingness to Serve as Lead Counsel or as a Member of a Steering Committee

By this letter, I am applying to serve as a member of a steering committee.

7. Category of Plaintiffs I Would Like to Represent

I believe that my experience and the experience of the other lawyers at my firm would be best utilized by representing consumers in the litigation before the Court. To the extent the Court intends to appoint different groups of lawyers to represent owners and lessees, I would request appointment as a member of the steering committee for vehicle owners.

As described above, I and my firm are well qualified to represent plaintiffs in what will surely be an extremely complicated and highly labor intensive litigation. I appreciate your honor's consideration of my application.

Very truly yours,

/S/

Eric M. George

Encl.